

# EXHIBIT B

<u>Bates Begin</u>	<u>Bates End</u>	<u>No Pages</u>	<u>Description</u>	<u>SGWS Objections</u>
764	777	14	Houston Casualty Renewal Application	Relevance
1379	1388	10	Premier Payroll Status Change Form (Suarez) - 04/24/2000	Relevance
1401	1402	2	Plaintiff's Hire Resume with Notations - 04/11/2000	Relevance
1408	1408	1	Premier Payroll Status Change Form (Suarez) - 05/05/2003	Relevance
1409	1409	1	Premier Payroll Status Change Form (Suarez) - 05/01/2002	Relevance
1413	1414	2	Congratulations to M Suarez on transfer to WMI Admin - 05/04/2016	
1436	1437	2	Final Written Warning signed by Plaintiff - 12/01/2017	
1438	1440	3	Performance Improvement Plan - 01/11/2017	
1441	1443	3	Record of Disciplinary Action - 01/18/2017	
1444	1444	1	Record of Disciplinary Action - Verbal Warning - 11/04/2016	
1445	1448	4	Disciplinary Memo with attached Cycle Count Daily Procedure - 09/02/2016	
1449	1455	7	Performance Appraisal (Suarez) - 02/01/2014	
1456	1460	5	Performance Appraisal (Suarez) - 02/01/2013	
1465	1468	4	Performance Appraisal (Suarez) - 03/01/2012	
1469	1475	7	Performance Appraisal (Suarez) - 04/01/2011	
1476	1482	7	Performance Appraisal (Suarez) - 04/15/2010	
1483	1483	1	Termination Letter - 04/10/2018	
1504	1504	1	Email Re: Bonus Check from Premier (Suarez) - 05/09/2005	Relevance
1506	1506	1	Premier Payroll Status Change Form (Suarez) - 12/01/2004	Relevance
1929	1938	10	Suarez Severance Agreement - 04/06/2018	
1944	1948	5	WMI Administrator Job Description - 05/04/2016	
2220	2220	1	Email from John Wilkinson to Maria Suarez - 10/27/2016	
2221	2222	2	Email from Maria Suarez to John Wilkinson - 10/26/2016	
2259	2260	2	Email Chain Re Inventory Control - 08/04/2016	
P635	P758		Deposition Transcript of Maria Suarez 10-07-2016 with Exhibits as follows:	
P265	P266		Ex 24 - Email of 5-2-2013	
			Ex 26 - Inventory Control Clerk Job Description	Relevance, never
			Ex 34 - Email of 5-2-2013	produced in discovery

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			Deposition Transcript of John Wilkinson 10-26-2016 with Exhibits as follows Ex 34 - Email of 5-2-2013	Relevance, transcript and exhibits never produced in this action
P759	P766		Complaint - Herdocia v. SGWS, 14-cv-3196 (EDNY)	Relevance, hearsay
			Answer - Herdocia v. SGWS, 14-cv-3196 (EDNY)	Relevance, never produced in discovery
P769	P791		Docket Sheet - Herdocia v. SGWS, 14-cv-3196 (EDNY) Complaint - Sajous v. SGWS, 15-cv-03270 (EDNY)	Relevance, never produced in discovery Relevance, hearsay
			Answer - Sajous v. SGWS, 15-cv-03270 (EDNY)	Relevance, never produced in discovery
SGWS524			Docket Sheet - Sajous v. SGWS, 15-cv-03270 (EDNY)	Relevance, never produced in discovery
SGWS1447	SGWS1448		Receiving - 2 to 3 Times Per Week (Dep Exhibit 2)	
			Cycle Counting Daily Procedure (Dep Exhibit 4)	
PL269			Email from Dina Wals Margolis to Female ICCs - 5/16/2013	Relevance
PL278	PL279		Email from Michael Munoz to Dina Wald Margolis - 6/4/2013	Relevance
PL283	PL284		Email from Dina Wald Margolis to J Sajous - 6/19/2013	Relevance
PL287	PL291		Memo to E Toohig From Dina Wald-Margolis - 6/20/2013	
PL293	PL296		Memo to E Toohig From Dina Wald-Margolis - 8/12/2013	
PL324			Retaliation is Strictly Prohibited	Relevance
PL329			Retaliation	Relevance
PL378			Vegh Pay Stub	Relevance, authenticity
PL380			Sajous Pay Stub	Relevance, authenticity

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PL382			Marquez Pay Stub	Relevance, authenticity
PL545	PL551		Employer Position Statement - 3/13/2019	Relevance, hearsay
PL807			Schedule	Relevance
PL809	PL810		Social Media Posts	Relevance

**Plaintiff's Additional Trial Exhibits (not pre-marked)****SGWS Objection**

<b><u>Bates Begin</u></b>	<b><u>Bates End</u></b>	<b><u>No Pages</u></b>	<b><u>Description</u></b>	
1566	1575	10	Joseph Durante applied for job: WMI Administrator – NY - 01/30/2016	
1577	1588	12	Willie Johnson applied for job: WMI Administrator – NY - 01/30/2016	
1590	1598	9	Joseph Lynn applied for job: WMI Administrator – NY - 01/30/2016	
1600	1608	9	Michael McKeithen applied for job: WMI Administrator – NY - 01/30/2016	
1648	1656	9	Nick Vukov applied for job: WMI Administrator – NY - 01/30/2016	
1658	1863	206	Records Regarding Applicants for WMI ICM Position - 04/04/2016	
1864	1864	1	WMI ICM Applicant List - 04/01/2016	
1952	1960	9	Email Chain Re Errors - 08/29/2017	
1985	1985	1	Email from John Wilkinson to Maria Suarez - 01/25/2017	
2045	2048	4	Email from Cory Cooper to Elizabeth Toohig - 12/08/2016	
2059	2060	2	Email from Eric Meyer to Maria Suarez - 11/30/2016	
2072	2074	3	Email from Elizabeth Toohig to Roy Kohn 12.5.2016 - 12/05/2016	
2104	2162	59	Email from E Toohig to Roy Kohn - 12/03/2016	
2164	2209	46	Email to Shanieka Jean Charles from E Toohig - 11/23/2016	
2233	2233	1	Email Chain Toohig/Suarez - 10/03/2016	
2265	2265	1	Email Toohig/Suarez - 07/13/2016	
2268	2270	3	Email Metzger/Wilkinson - 03/01/2018	Relevance, authenticity
2285	2317	33	Suarez/Durant Email - 10/24/2017	
2318	2320	3	Shanieka/Wilkinson Email - 09/18/2017	
2428	2428	1	Emails Between R Cohn & Cory Cooper - 2/13/2017	
2521	2527	7	Meeting Invitations from Wilkinson - 02/02/2017	
2574	2574	1	Personnel Action Notice (Durant ICM to WMI ICM) - 05/23/2016	
1084	1094	11	Organizational Chart Jan 2016 - 01/01/2016	Relevance
1095	1106	12	Organizational Chart Apr 2018 - 04/01/2018	Relevance
1107	1122	16	Organizational Chart Aug 2018 - 08/01/2018	Relevance
1123	1138	16	Organizational Chart Jan 2017 - 01/01/2017	Relevance
1150	1165	16	Organizational Chart Oct 2016 - 10/01/2016	Relevance
1485	1485	1	Personnel Action Notice (Suarez ICM to WMI Admin) - 05/15/2016	
1500	1500	1	Personnel Action Notice - Admin Asst to ICM (Suarez) - 06/04/2007	Relevance

**Plaintiff's Additional Trial Exhibits (not pre-marked)****SGWS Objection**

<b><u>Bates Begin</u></b>	<b><u>Bates End</u></b>	<b><u>No Pages</u></b>	<b><u>Description</u></b>	
2530	2530	1	Congratulations to Tonisha Durant on becoming Inventory Control Manager - 03/14/2014	Relevance
2541	2546	6	Tonisha Durant Hiring Info and Resume - 12/06/2007	Relevance
2362	2363	2	Email to John Wilkinson from Kevin Randall 10.22.16 - 08/30/2016	
2710	2716	7	2015 Performance Appraisal - Tonisha Durant	Relevance
2717	2723	7	2016 Performance Appraisal - Tonisha Durant	Relevance
2724	2726	3	2017 Performance Appraisal - Tonisha Durant	Relevance
2727	2730	4	2018 Performance Appraisal - Tonisha Durant	Relevance
2731	2731	1	Inventory Control Manager Job Description	
2732	2732	1	WMI Inventory Control Manager Job Description	
			Deposition Transcript of Elizabeth Toohig 10-26-2016 with the following Exhibits	Relevance, transcript and exhibits never produced in this action
			Ex 6 - Inventory Control Clerk Job Description	Relevance, transcript and exhibits never produced in this action
			Ex 7 - Warehouse Worker Job Description	Relevance, transcript and exhibits never produced in this action
			Ex 24 - Email of 5-2-2013	Relevance, transcript and exhibits never produced in this action
			Ex 26 - Inventory Control Clerk Job Description	Relevance, transcript and exhibits never produced in this action
			Ex 42 - Female Applicants Reasons Not Hired	Relevance, transcript and exhibits never produced in this action
			Ex 45 - Local 1D Top Pay List	Relevance, transcript and exhibits never produced in this action

**Plaintiff's Additional Trial Exhibits (not pre-marked)**

**SGWS Objection**

<b><u>Bates Begin</u></b>	<b><u>Bates End</u></b>	<b><u>No Pages</u></b>	<b><u>Description</u></b>	
			Employee Handbook dated July 30, 2012 (Dep Exhibit 8)	Relevance, never produced in this action
			New Hire Notice - Justin Vegh (Dep Exhibit 17)	Relevance, never produced in this action